



January 17, 1995

NPE 69242.02.04

~~Mr. Nick Ceto~~

Sean Sheldrake

U.S. Environmental Protection Agency
1200 Sixth Avenue, HW-113
Seattle, WA 98101

Dear Nick:

Sean

Subject: Submittal of Industrial Complex Asbestos Assessment Report

Attached for your review are three copies of the Asbestos Assessment Report for the Bunker Hill Industrial Complexes as prepared by CH2M HILL's subcontractor Converse Consultants MR. As you can see, the report is rather lengthy, even with double-sided printing. Because of this, I have not distributed copies to the entire Bunker Hill project team as we normally do. Upon your direction, CH2M HILL will copy and distribute the assessment report as you see fit.

The text of the assessment report identifies a couple items that I believe merit discussion amongst the Bunker Hill project team as to the potential impact to the project. These items include:

- Section 2.2, Abatement Approaches. A new OSHA asbestos regulation (fully enforceable after April 10, 1995) appears to require more stringent respiratory protection measures than the asbestos abatement industry is currently using. If fully enforced, asbestos abatement costs are likely to increase over those identified in the report. The Bunker Hill site may have some site-specific aspects (such as remote location, slated for demolition) that may provide some latitude for interpretation within the context of the new regulation.
- Section 2.2, Structural Survey Options. Three options for conducting the structural survey prior to demolition are identified and discussed. Each option has its relative merits. To maintain the planned asbestos abatement and demolition schedule this spring/summer, I recommend a decision be made within the next month on the survey approach such that its planning

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and implementation can take place this winter/spring.

- Section 2.2, Category 1 Non-friable Asbestos. As discussed in the assessment report, whether Category 1 non-friable asbestos is judged by EPA to be regulated asbestos containing material (RACM) will directly affect the abatement approaches used and abatement costs. It is recommended that this item be discussed with EPA Air Compliance personnel enabling a decision that reflects the site-specific aspects of the required abatement (large quantities, on-site disposal, remote site). This discussion and resulting decisions should ideally be conducted prior to the bidding of asbestos abatement work.
- Section 3, Abatement Cost Estimates. Note that the abatement costs are shown as a range (between \$3.1M to \$4.6 M) and are based on the abatement approaches that could potentially occur. Early decisions by the project team concerning some of the items identified in Section 2.2 will have the ability to influence the actual abatement cost. Also note that the high range of the cost estimate is greater than that cost we included in our recent site-wide remediation costing effort (we used \$3M, I believe).

You should also be aware that CH2M HILL's subcontract with Converse provides for their ongoing support on future abatement approach discussions, if necessary. I believe their site-specific knowledge and knowledge of the abatement industry could be very beneficial in guiding necessary project decisions.

Should you have any questions concerning this report, please feel free to give me a call at 453-5005, extension 5069.

Sincerely,

CH2M HILL



Joan Stoupa, P.E.
Project Manager

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cc: File
Tom Wise/Converse